

# **EXHIBIT 8**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan  
Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma, L.P., et al.  
Case No. 17-OP-45005  
City of Cleveland, Ohio vs. Purdue  
Pharma, L.P., et al.  
Case No. 18-OP-45132  
The County of Summit, Ohio,  
et al. v. Purdue Pharma, L.P.,  
et al.  
Case No. 18-OP-45090

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Videotaped Deposition of Joseph Rannazzisi  
Washington, D.C.  
April 26, 2019  
8:37 a.m.

Reported by: Bonnie L. Russo  
Job No. 3301876

1 Videotaped Deposition of Joseph Rannazzisi held  
2 at:

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8 Williams & Connolly, LLP  
9 725 12th Street, N.W.  
10 Washington, D.C.  
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13 Pursuant to Notice, when were present on behalf  
14 of the respective parties:  
15  
16  
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7 Patrick J. Forrest, United States Department of  
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Daniel Russo, Videographer

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1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: Good morning. We  
4 are going on the record at 8:37 a.m. on April  
5 26, 2019.

6 Please note that the microphones are  
7 sensitive and may pick up whispering, private  
8 conversations and cellular interference.  
9 Please turn off all cell phones or place them  
10 away from the microphones as they can interfere  
11 with the deposition audio. Audio and video  
12 recording will continue to take place unless  
13 all parties agree to go off the record.

14 This is Media Unit 1 of the  
15 video-recorded deposition of Joseph Rannazzisi  
16 taken by counsel for defendant in the matter of  
17 In Re: National Prescription Opiate filed in  
18 the United States District Court for the  
19 Northern District of Ohio, Eastern Division,  
20 Case No. 17-MD-2804.

21 This deposition is being held at  
22 Williams & Connolly located at 725 12th Street,  
23 Northwest, Washington, D.C.

24 My name is Daniel Russo from the  
25 firm of Veritext Legal Solutions. I'm your

1 videographer today. The court reporter is  
2 Bonnie Russo from the firm Veritext Legal  
3 Solutions.

4 Counsel and all present in the room  
5 and everyone attending remotely will now state  
6 their appearances and affiliations for the  
7 record, please.

8 MR. EPPICH: Chris Eppich of  
9 Covington & Burling for McKesson.

10 MS. MONAGHAN: Meghan Monaghan of  
11 Covington & Burling for McKesson.

12 MS. MAINIGI: Enu Mainigi, Williams  
13 & Connolly for Cardinal.

14 MS. McNAMARA: Colleen McNamara of  
15 Williams & Connolly for Cardinal.

16 MS. VENTURA: Catie Ventura from  
17 Kirkland & Ellis for Allergan.

18 MR. LIVINGSTON: Scott Livingston,  
19 Marcus & Shapira for defendant HBC.

20 MR. TYE: Michael Tye of Arnold &  
21 Porter for Endo.

22 MS. WINCKEL: Emilie Winckel of  
23 O'Melveny & Myers for J&J and Janssen.

24 MR. STEPHENS: Neal Stephens from  
25 Jones Day for Walmart.

1 MR. DAVISON: William Davison from  
2 Ropes & Gray for Mallinckrodt and Specgx LLC.

3 MR. O'CONNOR: Andrew O'Connor from  
4 Ropes & Gray for Mallinckrodt.

5 MS. O'GORMAN: Debra O'Gorman from  
6 Dechert for Purdue.

7 MS. CONROY: Mildred Conroy from The  
8 Lanier Law Firm for plaintiffs.

9 MR. FULLER: Mike Fuller for the  
10 plaintiffs.

11 MR. FARRELL: Paul Farrell, Jr., for  
12 the plaintiffs.

13 MS. SINGER: Linda Singer, Motley  
14 Rice, for the plaintiffs.

15 MR. FINKELSTEIN: David Finkelstein,  
16 Department of Justice for the DEA.

17 MR. BENNETT: James Bennett from the  
18 U.S. Attorney's Office for the Northern  
19 District of Ohio for the United States, the DEA  
20 and the witness in his official capacity.

21 MR. UTTER: Greg Utter here on  
22 behalf of Mr. Rannazzisi as his personal  
23 counsel.

24 SPECIAL MASTER COHEN: David Cohen,  
25 Special Master.

1 MR. FORREST: Patrick Forrest, Drug  
2 Enforcement Administration.

3 MS. BACCHUS: Renee Bacchus, U.S.  
4 Attorney's Office, Northern District of Ohio on  
5 behalf of DOJ, DEA and the witness.

6 MS. AGUINIGA: Sara Aguiniga, Motley  
7 Rice on behalf of plaintiffs.

8 MR. FELDMAN: Larry Feldman on  
9 behalf of the plaintiffs.

10 MS. MOORE: Kelly Moore on behalf of  
11 Rite Aid.

12 MR. STOFFELMAYR: Kaspar  
13 Stoffelmayr, Walgreens.

14 MR. HOBART: Geoffrey Hobart from  
15 Covington for McKesson.

16 MS. WICHT: Jennifer Wicht from  
17 Williams & Connolly for Cardinal Health.

18 MR. MATTHEWS: James Matthews for  
19 Anda.

20 MR. RUIZ: Anthony Ruiz, Zuckerman  
21 Spaeder for CVS Indiana, LLC and CVS Rx  
22 Services.

23 THE VIDEOGRAPHER: Anyone on the  
24 call that wants to identify themselves, please  
25 speak up.

1 MR. LADD: Matthew Ladd from Morgan  
2 Lewis on behalf of Rite Aid.

3 MR. PADGETT: Bill Padgett on behalf  
4 of H.D. Smith.

5 MR. BEISELL: Patrick Beisell from  
6 Jones Day on behalf of Walmart.

7 MS. BARBER: Maureen Barber from  
8 Morgan Lewis on behalf of the Teva defendants.

9 THE VIDEOGRAPHER: Will the court  
10 reporter please swear in the witness.

11  
12 JOSEPH RANNAZZISI,  
13 being first duly sworn to tell the truth, the  
14 whole truth and nothing but the truth,  
15 testified as follows:

16 THE VIDEOGRAPHER: You may proceed,  
17 Counsel.

18 EXAMINATION BY COUNSEL FOR McKESSON

19 BY MR. EPPICH:

20 Q. Good morning, Mr. Rannazzisi. My  
21 name is Chris Eppich, I represent McKesson in  
22 this litigation and I will be asking you some  
23 questions this morning.

24 Please state your full name for the  
25 record.

1 BY MS. MAINIGI:

2 Q. Yes.

3 A. I don't know. Because -- just  
4 because you have a system doesn't mean you are  
5 following your protocols in your system. You  
6 might have the greatest system in the world but  
7 if you are not following your own protocols, if  
8 you are not looking at each individual order  
9 that the system kicks out, doing due diligence,  
10 maintaining effective controls against  
11 diversion, then the system is worthless because  
12 you are not following the protocols that you  
13 established, so I can't say that.

14 Q. So following the protocols that you  
15 established, is that some sort of guidance that  
16 DEA put out to companies?

17 MS. SINGER: Objection. Vague.

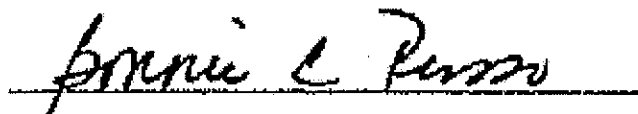
18 MR. BENNETT: Objection. Vague.  
19 Objection. Scope.

20 THE WITNESS: It would be -- it  
21 would be common sense for a company to  
22 establish protocols and then follow their own  
23 protocols within their suspicious order  
24 monitoring system.

25 BY MS. MAINIGI:

CERTIFICATE OF NOTARY PUBLIC

I, Bonnie L. Russo, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to computerized transcription under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

A handwritten signature in cursive script, reading "Bonnie L. Russo", is written over a horizontal line.

Notary Public in and for  
the District of Columbia

My Commission expires: June 30, 2020